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Attorney for Defendant
BERNADETTE ESCUE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 07-00610 JF
Plaintiff,)	
v.)	EX PARTE APPLICATION FOR ORDER
BERNADETTE ESCUE,)	PERMITTING TRAVEL FOR NEW
Defendant.)	EMPLOYMENT UPON NOTIFICATION TO
)	AND APPROVAL OF PRETRIAL
)	SERVICES, SUBMITTED WITH THE
)	APPROVAL OF THE AUSA AND PRETRIAL
)	SERVICES; DECLARATION OF COUNSEL
)	

Defendant Bernadette Escue, through counsel, applies for permission to travel to and from Portland, Oregon beginning January 28, 2008, so that she may work at the new job for which she recently was accepted in Portland, which job is to begin February 2, 2008. Also, because this involves ongoing employment of an undetermined duration, Ms. Escue further requests that such travel be permitted into the future subject to her (1) notifying Pretrial Services in advance of her intended travel and providing Pretrial Services with an itinerary of her intended travel and lodging and contact information during the dates of travel, (2) obtaining the approval of Pretrial Services, and (3) upon her return, providing Pretrial Services with any documentation necessary to verify such travel.

This application is submitted after consultation with the supervising Pretrial Services Officer and the AUSA handling this matter, both of whom have informed counsel that they have no objection to this proposal.

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DECLARATION OF COUNSEL

I, Mark R. Vermeulen, declare:

1. I am an attorney duly admitted to practice before this Court and I represent Defendant Bernadette Escue in this action.

2. I request that Ms. Escue be permitted to travel to and from Portland, Oregon. She recently was offered employment in Portland, which is to begin on approximately February 1, 2008. She therefore needs to travel to and from that city. She will continue to reside in the Bay Area, where she otherwise cares for her elderly parents. Her travel will sometimes be by airplane, and sometimes by ground travel (driving or other ground transportation).

3. Because this involves ongoing employment of a currently undetermined duration, I further request that such travel be permitted into the future on an ongoing basis subject to her (1) notifying Pretrial Services in advance of the intended travel and lodging and providing Pretrial Services with an itinerary of her intended travel and contact information during the dates of travel, (2) obtaining the approval of Pretrial Services, and (3) upon her return, providing Pretrial Services with any documentation necessary to verify such travel.

4. I have spoken with Pretrial Services Officer Tim Elder, the officer assigned to this case, and with Joe Fazioli, the AUSA handling this case, and we've discussed this situation. I have provided each of them with a copy of this *Application* and the accompanying *[Proposed] Order Permitting Travel* in advance of filing these documents, and they each have informed me that they have no objection to this request.

5. I will email a copy of this *Application* and the accompanying *[Proposed] Order Permitting Travel* to Pretrial Services Officer Tim Elder on the same date I file this via ECF, and a copy of each will be provided to AUSA Joe Fazioli automatically via ECF filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 21, 2008 at San Francisco, CA.

/S/
Mark R. Vermeulen